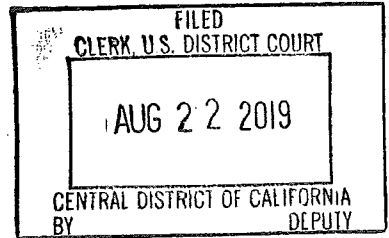


UNITED STATES DISTRICT COURT

for the

Central District of California



United States of America,

v.

JULIE RAINBIRD,

Defendant(s)

Case No.

19MJ03494

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of November 15, 2018 in the county of Los Angeles in the Central District of California, the defendant(s) violated:

Code Section

18 U.S.C. § 1344(2)

18 U.S.C. § 1028A(a)(1)

Offense Description

Bank Fraud

Aggravated Identity Theft

This criminal complaint is based on these facts:

Please see attached affidavit.

☒ Continued on the attached sheet.

Complainant's signature

Trent Thurber, Task Force Officer

Printed name and title

Sworn to before me and signed in my presence.

Date: 8/22/2019

15/

ALEXANDER F. MacKINNON

Judge's signature

City and state: Los Angeles, California

Hon. Alexander F. MacKinnon, U.S. Magistrate Judge

Printed name and title

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CLERK U.S. DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
LOS ANGELES

AFFIDAVIT

I, Trent Thurber, being duly sworn, declare and state as follows:

I. PURPOSE OF AFFIDAVIT

1. This affidavit is made in support of a criminal complaint and arrest warrant against Julie Rainbird ("RAINBIRD") for violations of Title 18, United States Code, Sections 1344(2) (Bank Fraud) and 1028A(a)(1) (Aggravated Identity Theft).

2. The facts set forth in this affidavit are based upon my personal observations; my training and experience; and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested complaint and arrest warrant and does not purport to set forth all of my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and part only.

II. BACKGROUND OF TRENT THURBER

3. I am a Federal Bureau of Investigations ("FBI") Task Force Officer ("TFO"), currently assigned to the Fraud & Cyber Crimes Bureau, Southern California High Tech Crimes Identity Theft Task Force. I have been a Deputy Sheriff with the Los Angeles County Sheriff's Department for the past thirty-one years. For the past 19 years I have been involved in numerous investigations and/or arrests of persons involved in forgeries, credit card skimming/manufacturing, and identity-theft related

cases. I have participated in the seizure of stolen merchandise, personal information, checks, credit cards, skimming devices, credit card making machines and manufacturing equipment on several occasions. I have personally prepared and served numerous search warrants for identity theft, credit card skimming/manufacturing and forgery related investigations and has assisted with numerous search warrants with fellow investigators. In the regular course of my duties, I investigate persons for identity theft and forgery/fraud related crimes. I have had conversations with suspects and other law enforcement officers about identity theft and forgery/fraud related subjects for the purpose of developing and broadening my own understanding of identity theft, forgeries, and offenders and their methods.

III. SUMMARY OF PROBABLE CAUSE

4. On November 15, 2018, RAINBIRD purchased a Harley Davidson motorcycle from Harley Davidson of Glendale using victim A.S.'s personal identifying information ("PII"). On June 19, 2019, RAINBIRD admitted to the fraudulent purchase.

IV. STATEMENT OF PROBABLE CAUSE

5. Based on my review of law enforcement reports, conversations with other law enforcement agents, and my own knowledge of the investigation, I am aware of the following:

A. Victim A.S. Reported Suspected Identity Theft

6. On December 27, 2018, victim A.S. reported the following to Glendale Police Department ("GPD") officers:

a. Victim A.S. is a resident of Glendale, California. She traveled to Florida with her family from November 11, 2018 through December 17, 2018. While she was in Florida, A.S. began receiving confirmation emails from various merchandisers, including Harley Davidson. A.S. believed someone was opening credit accounts in her name and placed a hold on her credit accounts.

b. When A.S. returned home from Florida, she found numerous pieces of mail from the various merchandisers. In particular, she found several pieces of mail indicating that someone had purchased a motorcycle from Harley Davidson of Glendale using her PII, including: a bill for a first payment; a notification of possible identity theft from the financing institution, Eaglemark Savings Bank; and a collections notice from United TranzActions dated November 26, 2018.

7. Based on my review of records found on FDIC.gov, I know that Eaglemark Savings Bank is actively FDIC insured and has been since August 25, 1997.

B. RAINBIRD Found with Harley Davidson Paperwork

8. Unrelated to the Glendale investigation, on November 19, 2018, Burbank Police Department ("BPD") officers stopped a vehicle RAINBIRD was driving for a malfunctioning brake light. RAINBIRD consented to a search of the car. Inside, Burbank officers found substantial evidence of fraud, including several counterfeit driver's licenses and numerous counterfeit checks in names other than RAINBIRD, including A.S. In a folder on the front passenger seat, officers found purchase paperwork for a

Harley Davidson motorcycle in Glendale and a Discover credit card in A.S.'s name. In a black backpack also found on the front seat, BPD officers found a color photocopy of a fraudulent California driver's license with A.S.'s name and a paper with A.S.'s social security number.

9. BPD officers arrested RAINBIRD for identity-theft related crimes.

C. Follow Up Investigation at Harley Davidson of Glendale

10. On June 13, 2019, I went to Harley Davidson of Glendale where an employee provided me with copies of the purchase paperwork for the motorcycle purchased in A.S.'s name on November 15, 2018. The paperwork was consistent with the paperwork A.S. received in the mail.

11. I spoke with an employee who had assisted with the sale of the motorcycle and showed her a photographic lineup with six pictures, including one of RAINBIRD. The employee was unable to identify the person who purchased the motorcycle in the photographic lineup.

D. RAINBIRD's Confession

12. On June 19, 2019, I, along with FBI Special Agent Ty Thomas, interviewed RAINBIRD at the Los Angeles County Sheriff's Department Century Regional Detention Facility, where she was being held on state charges. RAINBIRD was advised of and waived her Miranda rights and agreed to the interview. When we asked RAINBIRD about the Harley Davidson, she mentioned that BPD officers found paperwork for the Harley Davidson in her car but initially would not say whether she made the purchase. She also

commented that the purse in the car wasn't hers. After we explained to her that her cooperation with the investigation may help her as the recovery of the motorcycle could reduce the amount of loss she was responsible for, RAINBIRD said that she needed help but wanted to make sure we could help her. We told her we could not guarantee anything, but agreed to convey that she needed help. RAINBIRD then said, "You guys know I did it." When we asked if she had purchased the Harley Davidson motorcycle, RAINBIRD said "yes."¹ We showed her pictures of the Harley Davidson motorcycle, and she confirmed it was the motorcycle she had purchased.

V. CONCLUSION

13. For all of the reasons described above, there is probable cause to believe that RAINBIRD has committed violations of Title 18, United States Code, Sections 1344(2) (Bank Fraud) and 1028A(a)(1) (Aggravated Identity Theft).

/s/
TRENT THURBER,
FBI Task Force Officer

Subscribed to and sworn before me
this 22nd day of August, 2019.

ALEXANDER F. MacKINNON
UNITED STATES MAGISTRATE JUDGE

¹ RAINBIRD also purchased another motorcycle in Simi Valley using another victim's PII and both motorcycles were discussed during the interview. RAINBIRD admitted fraudulently purchasing both motorcycles.